

1 Deverie Christensen
Nevada State Bar No. 6596
2 **JACKSON LEWIS P.C.**
300 S. Fourth Street, Suite 900
3 Las Vegas, Nevada 89101
Tel: (702) 921-2460
4 Email: christensend@jacksonlewis.com

5 *Attorneys for Defendant*
6 *The Chapel, LLC*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9
10 NICOLE ZURSCHMIEDE,

11 Plaintiff,

12 vs.

13 THE LITTLE CHAPEL, LLC, a Domestic
Limited-Liability Company, d/b/a
14 CHAPEL OF THE FLOWERS, and DOE
Defendants I-X,

15 Defendants.

Case No.: 2:19-cv-00106-JCM-VCF

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT TO FILE A
RESPONSIVE PLEADING TO PLAINTIFF'S
COMPLAINT**

(Fourth and Final Request)

16 Defendant The Chapel, LLC doing business as Chapel of The Flowers ("Defendant"),
17 (erroneously sued as "The Little Chapel, LLC), by and through its counsel, Jackson Lewis P.C.,
18 and Plaintiff Nicole Zurschmiede ("Plaintiff") by and through her counsel, HKM Employment
19 Attorneys LLP, hereby stipulate and agree to a fourth and final extension of the time for
20 Defendant to file a responsive pleading to Plaintiff's Complaint.

21 Plaintiff served her Complaint on May 10, 2019, and Defendant's response was due on
22 May 31, 2019. On May 30, 2019, pursuant to stipulation of the parties, the Court granted
23 Defendant a 30-day extension up to including June 30, 2019, to file its responsive pleading to
24 Plaintiff's Complaint. (ECF No. 10). On June 28, 2019, pursuant to stipulation of the parties, the
25 Court granted Defendant a second extension up to including July 22, 2019, to file its responsive
26 pleading to Plaintiff's Complaint, so the Parties could actively engage in settlement negotiations
27 following Defendant's investigation of the allegations in the Complaint. (ECF No. 12). Due to
28 the Fourth of July Holiday and intervening summer vacations of the Parties and counsels,

1 settlement discussions took longer than anticipated. On July 24, 2019, pursuant to stipulation of
2 the parties, the Court granted Defendant a third extension up to including August 12, 2019, to file
3 its responsive pleading to Plaintiff's Complaint. (ECF No. 14).

4 The Parties remain actively engaged in settlement discussions and wish to avoid the
5 potentially unnecessary time and expense of Defendant's response to the Complaint, the Parties
6 completion of the FRCP 26(f) Conference, and the Parties exchanging initial disclosures.
7 Accordingly, the Parties have stipulated to a fourth and final extension of the deadline for
8 Defendant to file a response to the Complaint. The Parties have agreed to a three-week extension
9 to allow the Parties enough time to conclude their early settlement discussions.

10 Defendant shall, therefore, have a final three-week extension up to and including Tuesday,
11 September 3, 2019, to file a responsive pleading to Plaintiff's Complaint.

12 This stipulation and order is sought in good faith and not for the purpose of delay. Three
13 prior requests for an extension of time have been made. The Parties agree this is the final request
14 for an extension to permit the Parties to conclude settlement negotiations. The Parties are
15 diligently engaged in settlement negotiations and endeavoring to conclude this process prior to
16 September 3, 2019; and, respectfully request the Court's approval to permit the Parties a final
17 extension to exhaust early settlement discussions before incurring further litigation costs.

18 Dated this 9th day of August 2019.

19 /s/ Deverie J. Christensen
20 Deverie J. Christensen, Bar No. 6596
21 300 S. Fourth Street, Suite 900
22 Las Vegas, Nevada 89101
23 *Attorneys for Defendant*
The Chapel, LLC

/s/ Marta D. Kurshumova
Jenny L. Foley, Bar No. 9017
Marta D. Kurshumova, Bar No. 14728
1785 East Sahara, Suite 300
Las Vegas, Nevada 89104
Attorneys for Plaintiff
Nicole Zurschmiede

24 **IT IS SO ORDERED.**

25 Dated this 12th day of August, 2019.

26 

27
28 United States Magistrate Judge